

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Jamil Clayton Lane

Case: 2:23-mj-30248  
Assigned To : Unassigned  
Case No. Assign. Date : 6/12/2023  
USA V. LANE (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of a Firearm and Ammunition


This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: June 12, 2023

City and state: Detroit, MI

  
Complainant's signature  
Jeremy Jaskulski, Special Agent, FBI  
Printed name and title  
  
Judge's signature  
Hon. Kimberly G. Altman, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jeremy Jaskulski, being duly sworn, depose and state the following:

**INTRODUCTION**

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States code. I am empowered to conduct investigations of, and to make arrests for, offenses enumerated in Title 18 of the United States Code.

2. I have been employed by the Federal Bureau of Investigation (“FBI”), as a Special Agent, for approximately five years. I work on the Southeast Michigan Trafficking and Exploitation Crimes Task Force (“SEMTEC”). I have experience investigating child sexual exploitation and human trafficking crimes. I have also received training on and gained experience in investigating other violations of federal law, including threatening interstate communications, controlled substance violations, and firearms violations.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Jamil Clayton LANE for Felon in Possession of a Firearm and Ammunition, in violation of 18 U.S.C. § 922(g)(1).

4. The facts and information in this affidavit are based on my own investigation, information conveyed to me by other law enforcement officials, and my personal experience and training.

5. This affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant. I have not included each and every fact known to law enforcement regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Jamil Clayton LANE.

### **PROBABLE CAUSE**

6. On June 12, 2023, SEMTEC agents and task force officers, assisted by FBI SWAT agents, executed a federal search warrant at LANE's residence in Detroit, Michigan. Agents encountered LANE, four adult women, and LANE's two-year-old child inside of the house.

7. During the search of the house, agents found a DRACO AK-47 pistol (7.62x39mm), bearing serial number DA-9883-16 RO, in the living room closet. The firearm was loaded with 17 rounds of ammunition and one additional round in the chamber.

8. Agents also found the following in a bedroom that appeared to belong to LANE: one box of Winchester (.223) ammunition containing 15 rounds; one box of Winchester (.223) ammunition containing 20 rounds; 48 rounds of (.9mm) ammunition; 20 loose rounds of (.40 S&W) ammunition; five loose rounds of (.223) ammunition; one loose round of (7.62x39) ammunition; an unloaded (.556) drum style rifle magazine; an unloaded magazine for a (.9mm) Glock pistol; and a magazine loaded with 29 rounds of (.223) ammunition. The bedroom appeared to

belong to LANE because it contained male clothing, male shoes, and a framed poster containing a collage of photographs of LANE. Additionally, after LANE waived his Miranda rights and participated in an interview with agents, and while agents were preparing to transport him, I asked LANE where I could find clothes for him to wear. He indicated that I could find his shirt and shoes in the same bedroom.

9. During a Mirandized interview, LANE stated the following about the items found during the search. Approximately three weeks ago, LANE obtained the DRACO AK-47 pistol from an associate. LANE gave that associate an AR-15 style rifle in exchange for the DRACO AK-47. LANE wanted the AK-47 because it was smaller than the AR-15 rifle, which had a bump stock attached to it. LANE had the various types of ammunition found in his house because around New Years 2023, he and others shot firearms that used the various calibers of ammunition. Until recently, LANE had in his possession firearms that could shoot the different calibers of ammunition but had sold them. LANE also confirmed that he knew that he was prohibited from owning or possessing firearms because of his status as a convicted felon.

10. There is probable cause to believe that the AK-47 was manufactured outside of the state of Michigan. The firearm was engraved with "MADE IN ROMANIA" and "CAI GEORGIA, VT," which I know to be the marking for Century International Arms, formerly of Georgia, Vermont. Additionally, there is


no ammunition commercially manufactured in Michigan, and I know that Winchester ammunition is manufactured in East Alton, Illinois. The manufacturer's Illinois address was listed on the box of Winchester (.223) ammunition found during the search. Accordingly, the AK-47 and ammunition found during the search of LANE's residence travelled in or affected interstate commerce before coming into LANE's possession.

11. A criminal history check revealed that in 2016, LANE was convicted of Carrying a Concealed Weapon and Third Degree Criminal Sexual Conduct (Victim between 13-15 Years of Age) in Wayne County, Michigan and was sentenced to a minimum of three years in prison.

**CONCLUSION**

12. Probable cause exists that Jamil Clayton LANE, within the Eastern District of Michigan, possessed a firearm and ammunition, in violation of 18 U.S.C. § 922(g).

Respectfully submitted,

  
\_\_\_\_\_  
Jeremy Jaskulski  
FBI Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.

  
\_\_\_\_\_  
HONORABLE KIMBERLY ALTMAN  
UNITED STATES MAGISTRATE JUDGE

Dated: June 12, 2023